

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ESTER LELCHOOK, et al.,	:	
	:	
Plaintiffs,	:	<b>DECLARATION IN SUPPORT OF</b>
	:	<b>DEFENDANT AHMAD SAFA'S</b>
- against -	:	<b>MOTION TO DISMISS</b>
	:	
LEBANESE CANADIAN BANK SAL, et al.,	:	Civ. Action No. 18-cv-12401 (GBD)
	:	
Defendants.	:	Hon. George B. Daniels
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I, Ahmad Safa, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I make this Declaration based on my personal knowledge solely in support of my Motion to Dismiss in the above-captioned action.

2. I am a Lebanese citizen. I am not a citizen of the United States.

3. I live in Beirut, Lebanon.

4. I do not live, work, or own property in New York or anywhere else in the United States.

5. I have no bank accounts in New York or anywhere else in the United States.

6. I do not transact any business in New York or anywhere else in the United States.

7. I have not visited the United States in over ten years.

8. In or around 2003, I became the Assistant General Manager of the Branches and Operations department at Lebanese Canadian Bank ("LCB") in Beirut, Lebanon.

9. As part of my role as Assistant General Manager, I oversaw all LCB branches. My responsibilities included managing interest rates and recommending the opening of new branches.

10. I was not involved in the day-to-day operations of each branch, such as opening bank accounts, interfacing with clients, or processing wire transfers.

11. I was not involved with LCB's correspondent banking relationship with American Express Ltd. ("Amex").

12. LCB's relationships with correspondent banks were managed by the Correspondent Banking Unit within the bank's Treasury Department.

13. I was not involved with the Correspondent Banking Unit, as it was outside of my department of Branches and Operations. I did not work for nor oversee anyone in the Treasury Department.

14. I did not initiate LCB's relationship with Amex, nor did I ever communicate or otherwise interact with Amex during my tenure at LCB.

15. I was not personally or directly involved in approving, initiating, or otherwise processing LCB's wire transfers, including any wire transfers to Amex.

16. I did not travel to New York or the United States on behalf of LCB.

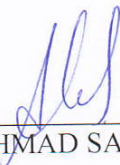
17. In early 2010, I left LCB to join the Banking Control Commission at the Central Bank of Lebanon, which is responsible for supervising and auditing banks and other financial institutions.

18. In 2015, I was reappointed to the Banking Control Commission.

19. In early 2020, I retired from the Banking Control Commission and am no longer working.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 11<sup>th</sup> day of February, 2022

  
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AHMAD SAFA